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A REGISTERED LIMITED LIABILITY PARTNERSHIP



April 15, 2024

VIA ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

RE: *Authors Guild et al. v. OpenAI, Inc., et al.*, and *Alter et al. v. OpenAI Inc., et al.*, Nos. 1:23-cv-08292-SHS & 1:23-cv-10211-SHS

Dear Judge Stein:

Plaintiffs write regarding their April 12, 2024, letter-motion for an informal discovery conference concerning (a) the FTC's interrogatories and (b) OpenAI's refusal to disclose the names of two third party witnesses. Dkt. No. 107.

On April 14, 2024, OpenAI disclosed the names of the two witnesses, mooted Plaintiffs' request for a court order compelling them to do so. The parties, however, remain at an impasse with respect to the other issues and continue to respectfully request a pre-motion conference under Local Rule 37.1.

Sincerely,

LIEFF CABRASER HEIMANN
& BERNSTEINS LLP

SUSMAN GODFREY LLP

COWAN, DEBAETS,
ABRAHAM & SHEPPARD
LLP

/s/ Rachel Geman
Rachel Geman

/s/ Rohit Nath
Rohit Nath

/s/ Scott J. Sholder
Scott J. Sholder